1 John A. White, Jr., Esq., SB#1741 WHITE LAW CHARTERED  $\mathbf{2}$ 335 West First St. Reno, NV, 89503 3 775-322-8000 795-322-1228 (fax) 4 john@whitelawchartered.com 5 Attorney for Debtors Out-of-Possession 6 UNITED STATES BANKRUPTCY COURT 7 8 DISTRICT OF NEVADA 9 \*\*\*\* 10 11 12 IN RE: SILVER STATE Case No. 21-14978-abl (Chapter 13 BROADCASTING, LLC 11) Jointly Administered with: 14 AFFECTS THIS DEBTOR. 21-14979-abl Golden State AFFECTS GOLDEN STATE Broadcasting, LLC 15 BROADCASTING, LLC 21-14980-abl Major Market 16 AFFECTS MAJOR MARKET Radio LLC RADIO LLC 17 X AFFECTS ALL DEBTORS. NOTICE OF APPEAL. 18 19 20 21 22 23

Pursuant to 28 U.S.C. §158(b)(1) and Fed. R. Bankr. Pro. 8001, 8002, 8003(a) and (b), Debtors Silver State Broadcasting, a Nevada LLC, Golden State Broadcasting, a Nevada LLC and Major Market Radio, a Nevada LLC (hereinafter collectively "Debtors"), by and through their attorney, John A. White Jr., of White Law Chartered, a Nevada professional corporation, hereby appeal to the Bankruptcy Appellate Panel from the ORDER GRANTING IN PART AND DENYING IN PART MOTION TO IMPOSE THE AUTOMATIC STAY entered in the above-captioned matter on June 9, 2023 as Docket No 590. A copy of the Order is attached hereto as Exhibit 1. Pursuant to 28 U.S.C. §158(c)(1) and Fed. R. Bankr. Pro. 8001, et. seq. the Debtors hereby elect to have this appeal heard by the Bankruptcy Appellate Panel. The parties to this appeal are as follows:

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Debtors Silver State Broadcasting, a Nevada LLC, Golden State Broadcasting, a Nevada LLC and Major Market Radio, a Nevada LLC.  By and through their attorney: John A. White, Jr., Esq., Nevada State Bar No. 1741, White Law Chartered, 335 W. 1st. St., Reno, NV 89503; Telephone: 775-322-8000 775-322-1228(fax) Email: john@whitelawchartered.com.  Chapter 11 trustee Michael W. Carmel, michael@mcarmellaw.com And by and through his attorney: Gregory E. Garman, Esq. Garman Turner Gordon 7251 Amigo Street, Ste 210 Las Vegas, NV 89119 (725)777-3000 (725) 777-3112 (fax) ggarman@gtg.legal  W. Lawrence Patrick, Receiver By and through his attorney: Brent A. Axelerod Esq. 1980 FESTIVAL PLAZA DRIVE STE 700, LAS VEGAS, NV 89135 (702) 262-6899 (702) 597-5503 (fax) baxelrod@foxrothschild.com  VCY America, Inc. By and through its attorney: Ogonna M. Brown, Esq. Lewis Roca Rothgerber Christie 3993 Howard Hughes Pkwy, Ste 600 Las Vegas, Nv 89169-5996 (702) 474-2622 (702) 949-8298 (Fax) Obrown@Lewisroca.com  C & E Haas Development Company, LLC: By and through its attorney: Tracy M. O'steen, Esq. Carlyon Cica Chtd. 265 E. Warm Springs Ste 107		
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Tracy M. O'steen, Esq. Carlyon Cica Chtd.	26	<del>_</del> <del>_</del> <del>,</del>
28 Carlyon Cica Chtd.	27	
LI ZONA D. WESTER STOPHING STATELLY	28	Carlyon Cica Chtd.

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3		
4	U. S. Trustee - LV - 11	
5	By and through its attorney: Justin Charles Valencia	
6	U. S. Dept. of Justice	
7	Office of the United States Trustee 300 Las Vegas Blvd. South, Ste 4300	
8	Las Vegas, NV 89101 702-388-6600 702-388-6658 (fax)	
9	justin.c.valencia@usdoj.gov	
10	Respectfully submitted this 23rd day of J	June, 2023.
11		WHITE LAW CHARTERED
12		,,,
13		
14		By:/s/ John White
15		
10		
16		John A. White, Jr. Attorney for the Debtors
16 17		John A. White, Jr.
16 17 18		John A. White, Jr.
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16 17 18 19 20 21 22 23 24 25 26		John A. White, Jr.
16 17 18 19 20 21 22 23 24 25		John A. White, Jr.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 2023, a true and correct copy of Debtors' Notice of Appeal was served via: Pursuant to Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date noted above and served through the Notice of Electronic Filing automatically generated by the Court to the following parties:

BRETT A. AXELROD on behalf of Other Prof. W. LAWRENCE PATRICKbaxelrod@foxrothschild.com, pchlum@foxrothschild.com; 7 mwilson@foxrothschild.com; arcdocketing@foxrothschild.com OGONNA M. BROWN on behalf of Creditor VCY AMERICA, INC. 8 obrown@lewisroca.com,ogonna-brown-4984@ecf.pacerpro.com, dberhanu@lewisroca.com, ombcalendar@lewisroca.com; 9 jhess@lewisroca.com,klope z@lewisroca.com; 10 gmercado1@lewisroca.com,gmercado@lewisroca.com CANDACE C CARLYON on behalf of Interested Party C & E HAAS 11 DEVELOPMENT COMPANY, LLC ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com; nrodriguez@carlyoncica.com; **12** 9232006420@filings.do cketbird.com; Dcica@carlyoncica.com 13 THOMAS H. FELL on behalf of Creditor CROWN CASTLE MU LLC tfell@fennemorelaw.com, clandis@fennemorelaw.com; 14 CourtFilings@fennemorelaw.com DAVID MINCIN on behalf of Creditor MINCIN LAW, PLLC 15 dmincin@mincinlaw.com, cburke@mincinlaw.com DAVID MINCIN on behalf 16 of Interested Party MINCIN LAW, PLLC dmincin@mincinlaw.com, cburke@mincinlaw.com 17 JOHN M NAYLOR on behalf of Creditor NAYLOR & BRASTER ATTORNEYS AT LAW PLLC jnaylor@naylorandbrasterlaw.com, 18 asharples@naylorandbrasterlaw.com 19 TRACY M. O'STEEN on behalf of Interested Party C & E HAAS DEVELOPMENT COMPANY, LLC tosteen@carlyoncica.com, 20 crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; 21 ccarlyon@carlyoncica.com STEVEN B. SCOW on behalf of Creditor BELLAIRE TOWER **22** HOMEOWNERS ASSOCIATION sscow@kskdlaw.com, dscow@kochscow.com U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov **23** JUSTIN CHARLES VALENCIA on behalf of U.S. Trustee U.S. TRUSTEE - LV

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- 11 justin.c.valencia@usdoj.gov

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\_/s/ Linda Mason\_\_\_\_

Linda Mason

An employee of White Law Chartered

## INDEX OF EXHIBITS

Exhibit No.	Description of Document	No. Pages
1	ORDER	